

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES)  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. )

TYSON FOODS, INC., et al, )

Defendants. )

4:05-CV-00329-TCK-SAJ

THE DEPOSITION OF ROBERT

SCHWABE, II, produced as a witness on behalf of  
the Plaintiff in the above styled and numbered  
cause, taken on the 12th day of June, 2007, in the  
City of West Siloam Springs, County of Delaware,  
State of Oklahoma, before me, Lisa A. Steinmeyer, a  
Certified Shorthand Reporter, duly certified under  
and by virtue of the laws of the State of Oklahoma.

1 in a way that is clear and you understand it. If  
2 you answer a question, can I presume then you've  
3 understood it?

4 A Okay.

5 Q First off, how long have you been a poultry 10:03AM  
6 grower?

7 A Thirty years.

8 Q When did you first start then?

9 A January 1977.

10 Q All right, and for whom have you been a 10:03AM  
11 poultry grower during that time period?

12 A Cargill.

13 Q Has that been a continuous period since 1977?

14 A Yes.

15 Q Have you had any other integrators that you've 10:03AM  
16 worked with or for?

17 MS. HILL: Object to the form, the use of  
18 the term worked for.

19 Q I might explain one other thing. There are  
20 going to be objections and you're entitled to go 10:04AM  
21 ahead and respond but they're trying to make a  
22 Record. Have there been any other integrators that  
23 you've grown turkeys for or poultry for?

24 A No.

25 Q And you are a turkey grower; is that correct? 10:04AM

1 MS. HILL: Same objection.

2 A No.

3 Q Are you a member of any kind of association  
4 dealing with growing of turkeys or poultry?

5 A I belong to Poultry Partners. 02:08PM

6 Q Other than Poultry Partners, is there any type  
7 of association or organization?

8 A That deals with poultry?

9 Q Yes, sir.

10 A No. 02:09PM

11 Q Have you ever heard of the Turkey Federation?

12 A I've heard of it.

13 Q Do you subscribe to any magazines or  
14 newsletters for any associations, like the Turkey  
15 Federation? 02:09PM

16 A I get Turkey World.

17 Q Is that something that you pay for by way of a  
18 subscription or is it furnished to you from Cargill  
19 or others?

20 A I subscribe to it. 02:09PM

21 Q What kind of information does it have in it?

22 A It's general information about the turkey  
23 business, about the raising and everything about the  
24 turkey business.

25 Q How long have you been receiving Turkey World? 02:09PM